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CH2M HILL/EPA
REM IV
Martha C. Rose Chemical Company Site

B&V Project 64580
B&V File 3050
January 21, 1988

U.S. EPA Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: PRP Meeting Minutes

Attention: Mr. Steven Kinser
Remedial Project Manager

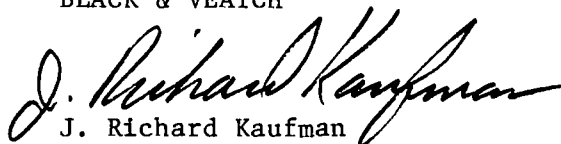
Gentlemen:

Enclosed please find our write-up of the minutes from the EPA meeting with the PRPs held on January 14 pertaining to approval of the work plan for remediation of the Martha C. Rose site.

Please call should you have any questions concerning the enclosed meeting minutes.

Very truly yours,

BLACK & VEATCH


J. Richard Kaufman
Site Manager

jdb
Enclosures

cc: Mr. Jeff Hullinger, RTL, CH2M HILL
Mr. Rick Peoples, ARM, B&V
Mr. John Edwards/File, AFDPM, B&V
Ms. Jan Walstrom, B&V



40027537
SUPERFUND RECORDS

MEETING SUMMARY
CSI WORK PLANS FOR PHASE II REMOVAL ACTIONS
MARTHA G. ROSE CHEMICAL COMPANY SITE
HOLDEN, MISSOURI

Meeting held on Thursday, January 14, 1988, 10:00 a.m. at EPA Region VII Offices, Kansas City, Kansas.

Attending:

<u>Name</u>	<u>Representing</u>	<u>Phone</u>
Leo Alderman	EPA - TSCA	(913) 236-2835
George Hess	EPA-Emergency Planning & Response	(913) 236-3888
Steven E. Kinser	EPA-Superfund	(913) 236-2856
Robert L. Morby	EPA-Superfund	(913) 236-2855
Erlene Wilson	EPA-Congressional Liason	(913) 236-2806
Steve Wurtz	EPA-Community Affairs	(913) 236-2803
Dick Kaufman	Black & Veatch	(913) 661-6429
Jan Walstrom	Black & Veatch	(913) 661-6416
Bill Weis	Missouri Dept. of Natural Resources	(314) 751-3176
Bob Fackler	Rose Steering Committee (PRP)	(913) 296-6515
Robin Robinson	Clean Sites, Inc.	(816) 732-5529
William C. Looney	Rollins Environmental Services	(713) 947-6066
Clayton Page	Rollins Environmental Services	(504) 292-4922
Eugene J. Senat	Rollins Environmental Services	(504) 292-4922
Milton Wall	Rollins Environmental Services	(504) 292-4922

Mr. Robert Morby opened the meeting by calling for introductions by each of the attendees. Mr. Morby then initiated discussions by presenting EPA's objectives to be accomplished during the meeting. These objectives were as follows:

- o Resolution of the most significant Phase II Work Plan comments presented by EPA to CSI during phone conversations and formally, in a letter dated January 7, 1988.
- o Resolution of Phase II Work Plan comments of lesser significance presented by EPA to CSI by letter dated January 7, 1988, if sufficient time was available.

- o Consideration of issues concerning the Phase II removal work which may be of import to the community of Holden.
- o Consideration of issues concerning the Phase II removal work which may be of import to the State of Missouri.

Mr. Robin Robinson stated that the goal of Clean Sites, Inc. (CSI) was to begin the Phase II removal work at the site as soon as possible. Further, Mr. Robinson stated that CSI and their contractor, Rollins Environmental Services (Rollins), had come to the meeting prepared to discuss point by point answers to EPA's January 7, 1988 comment letter.

The two major issues requiring resolution prior to approval of the Work Plans by EPA are: (1) problems associated with the presence of considerable quantities of contaminated dust inside the warehouse, and (2) appropriate level(s) of personnel protection to be utilized during the various activities necessary to accomplish the removal work at the site. A summary of items discussed and agreed to by CSI and EPA concerning the resolution of these two issues is presented below:

Problems Associated with the Contaminated Dust

- o Shipment of Transformers - It was agreed that small transformers (defined as the size of a refrigerator) would be transported from the site inside a fully enclosed van (defined as a 40-45 ft., semi-truck). It was agreed that larger transformers would be vacuumed with a Hepavac, wrapped individually with a tarp, and transported from the site on a flatbed truck. The tarps will be inspected upon arrival at the landfill. The tarps will be disposed of at the landfill with the transformer or will be re-used throughout the project, if feasible. At the end of the removal operation at the site, the tarps will be treated as a consumable item and disposed of at the landfill. EPA suggested that it may be more cost-effective to wrap each large transformer in plastic and then in a tarp. The plastic-wrapped transformer would then be landfilled and the tarp re-used throughout the life of the removal action. CSI stated that they would consider utilizing the alternative method of covering and disposing the large transformers proposed by EPA.
- o Shipment of Liquids - It was agreed that all liquids leaving the site would be shipped in tanker trucks to the incinerator for disposal. Transformer liquids will be pumped from the transformer into the tanker truck while located inside the warehouse building. Drummed liquids will be pumped from drums into the tanker truck at the loading dock area on the west side of the warehouse. It was agreed that prior to movement of any tankers into the warehouse, a general floor sweeping of the warehouse traffic area would be performed. It was also agreed that, at a minimum, all tanker truck wheels would be washed prior to the tanker exiting the site.

- o Shipment of Crushed Drums - It was agreed that, to minimize the spread of contaminated dust, all drum crushing operations would be conducted in one of two locations: either inside the warehouse or outside the warehouse in an area covered by a plastic tent-like structure. It was also agreed that all crushed drums would be transported from the site in a totally enclosed van.
- o Shipment of Crates - It was agreed that exterior surfaces of the crates would be vacuumed with a Hepavac and transported from the site on a flatbed truck.

Levels of Personnel Protection

- o Action Levels for Personnel Protection - A table of specific action levels to be used in determining the appropriate level of personnel protective equipment to be worn at the site was included in the revised Section 6 of the Work Plans. Specifically, an upgrade from Level C to Level B protective equipment will be performed by on-site workers when their activities involve direct contact with the waste and upon advisement from the Site Safety Coordinator.
- o Personal Air Samples - It was agreed that personal air samples would be collected according to the following schedule:
 - Daily throughout initiation of Phase II removal work at the site.
 - At the change of each major removal activity.
 - Weekly throughout the remainder of the removal work.
- o Definition of Level C Personnel Protection - Level C respiratory protection, as defined in the Phase II Removal Work Plans, consists of full-face respirators with cartridges. Based on recent air monitoring results for the site, EPA's health and safety personnel recommended the use of full-face respirators with HEPA/Organic canisters for Level C respiratory protection at the Rose Chemicals site. It was agreed that EPA would provide Clean Sites and Rollins with copies of ATSDR and OSHA opinions concerning respiratory protection at the site as soon as possible. Rollins' representatives agreed to have the opinions reviewed by their corporate legal and health and safety personnel. Rollins will then contact EPA concerning the outcome of that review and any modifications to the Site Safety Plan which may be required.
- o Definition of a "No Waste Contact Activity" - It was agreed that a general statement would be added in Section 6 of the Work Plans to define a "no waste contact activity" during the removal efforts at the site to mean, in essence, support activities conducted outside of the warehouse building but not including sampling.

- o Use of Saranex Tyveks - A recommendation was made by EPA for the use of Saranex tyveks during those activities which present the potential for worker contact with PCB-contaminated oil. It was agreed that information will be added to the Work Plans which will define the worker activities which will necessitate the donning of Saranex tyveks.

Two other issues precipitated general discussion during the meeting: (1) consideration of community concerns; and (2) consideration of State of Missouri concerns. A summary of the discussions concerning these two items appears below.

Consideration of Community Issues

Mr. Morby initiated the discussion of the importance of community awareness and involvement to the success of the Phase II removal actions at the site. The EPA would like to have the Holden community's input on the removal work as presented in the Phase II Work Plans prior to the Agency's formal approval of the documents. Mr. Robinson agreed to schedule a public meeting in Holden. It was agreed that the overall approach for the Phase II removal work will be presented to the community by Clean Sites during a public meeting tentatively scheduled for the last week in January 1988. Steve Kinser will attend the meeting as the EPA representative. Bill Weis of the Missouri Dept. of Natural Resources (MDNR) was invited to attend the meeting on behalf of the State. EPA will notify the appropriate U.S. congressmen of the upcoming meeting.

Consideration of State of Missouri Issues

Mr. Morby asked Mr. Weis if the State had any comments or issues concerning the removal work plans which required discussion and resolution prior to final approval of the plans by the EPA. Mr. Weis stated that he was attending the meeting for informational purposes and had no outstanding issues requiring resolution. Mr. Weis stated that MDNR was in the process of drafting the NPDES permit required for a portion of the removal activities. The permit should be ready for issuance in the near future.

A point by point discussion of specific comments presented to CSI in EPA's letter dated January 7, 1988 which were not incorporated into the revised Work Plans or not previously addressed during the meeting was then undertaken. Resolution of the specific items addressed is presented below.

- o Contaminated Equipment - It was agreed that all items presently located inside the warehouse and the south building would be considered to be PCB-contaminated and handled as such during the removal operation.
- o Soil Excavation - It was agreed that if soil excavation is necessary during the removal operation, an addendum to the

Work Plan will be prepared and submitted to the EPA for approval. The addendum will describe specific activities to be undertaken during the proposed soil excavation work.

- o Transformer Fin Removal - It was agreed that detachment of transformer fins for the purposes of allowing clearance during transport or load balancing during transport would be considered for approval by EPA on an item-specific basis.
- o Transformer Flushing - It was agreed that all transformers on-site will be flushed prior to transport from the site. Fluid used during the flushing operation will not be recycled.
- o Miscellaneous Material Currently Located Inside Transformer Carcasses - It was agreed that capacitor parts and other material currently found inside several transformer carcasses on-site would be removed from the transformer prior to flushing. Once removed, the material will be drummed or crated as appropriate and will be inventoried as unknown items.
- o Handling of Bulk Storage Tanks - It was agreed that all bulk storage tank parts will be hydroblasted, cut with shears and placed on flat bed trucks for transport to the disposal facility.
- o Handling of Bagged Capacitor Parts - It was agreed that oil saturated capacitor bags will be drummed for transport. Bags which are not saturated will either be loaded into tarpaulin covered roll-off boxes or be loaded into "Pan Vans" for transport to the disposal facility. Rollins' representatives agreed to contact EPA the week of January 18 concerning the exact method of transport to be used for unsaturated bags. No inventory information written on capacitor bags will be retrieved by CSI during the removal work.
- o Inspection of Containers Drained of Liquid - It was agreed that all containers will be inspected following draining operations to ensure that no sludge or excess fluid remains on the bottom of the container.
- o Disposal of Poly Sheeting, Containment Pans, Etc. - It was agreed that miscellaneous items such as poly sheeting, containment pans and other items used during the removal work will be drummed during demobilization and disposed of per instructions found in Section 4.4.2 or 4.4.7 of the Work Plan.
- o Equipment Decontamination - It was agreed that information would be added to the Work Plans specifically designating and defining an equipment holding area on-site to be used to locate decontaminated equipment for which wipe test results are pending. If wipe test results indicate a PCB value of less than 10 ug/100 cm², the equipment may be moved off-site.

- o Sample Shipment - It was agreed that all samples would be shipped air cargo to Trinity Labs for analyses.
- o Reagent List for Sample Analysis - Reagents required for sample analysis are pesticide grade hexane and 95 - 98% sulfuric acid.
- o Extraction Solvent - Hexane will be used during the extraction process because it is easily extractable and is less carcinogenic than methylene chloride.
- o Amount of Florisil - The described procedure will utilize 10 cc of florisil.
- o Section 4, Figure 7 - References to Figure 7 have been deleted. No Figure 7 is included in the revised plan.
- o EPA Evaluation of PCB Analysis Procedures - Steve Kinser agreed to contact Region VII's lab for clarification of any outstanding issues concerning evaluation of the analytical protocol presented.
- o QA/QC Plan - EPA comments on the revised QA/QC plan will be forwarded to CSI as soon as Region VII's lab has reviewed the revised document.
- o Road Repair and On-Site Construction - It was agreed that no on-site road construction would be performed during the removal operations.
- o Spill Notification Procedures - It was agreed that the SPCC Plan should be modified such that the Region's 24 hour spill number will be called to notify EPA of a spill regardless of the time of day.
- o Figure 7-3 - It was agreed that reference to direct notification of Steve Kinser should be deleted from the figure.
- o Inclusion of NPDES Permit - It was agreed that a copy of the NPDES permit would be included in the Plan upon receipt of the permit from MDNR.
- o Map of Exclusion Zone - It was agreed that the map showing the exclusion zone would be modified to show staked "hot spot" contamination areas on the site. Further, it was agreed that the Health and Safety Plan would be modified to present the criteria used to designate "hot spot" areas.

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The following is a summary of items which CSI/Rollins agreed to resolve and communicate to EPA during the week of January 18, 1988.

- o Scheduling of a Public Meeting with the Holden City Council.

- o Rollins' corporate policy concerning appropriate personnel protective equipment to be used during removal activities at the site.
- o Use of tarped roll-off boxes or "pan vans" to transport unsaturated bagged capacitors.

The following is a summary of items which EPA agreed to provide to CSI for information purposes to aid in modification of the Phase II Work Plans.

- o Copies of the OSHA letter concerning health and safety recommendations for work at the Rose Chemicals site.
- o Copies of the ATSDR letter concerning health and safety considerations for work at the Rose Chemicals site.
- o A letter of conceptual agreement between EPA and CSI concerning the scope of work presented in the Phase II Work Plans.

CSI/Rollins agreed to provide EPA with the agreed upon modifications to the Work Plans within one week.

The meeting was adjourned.

JSW:jdb